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## MEMO ENDORSED

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July 3, 2023

### VIA ECF

The Honorable Edgardo Ramos  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Defendants' request for an extension to file the stipulation of dismissal, until July 17, 2023, is granted. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: July 3, 2023  
New York, New York

Re: *Franco v. LTS Century Building, LLC et al.*, 19-cv-09846 (ER)

Dear Judge Ramos:

We represent Defendants LTS Century Building, LLC, Barnes & Noble, Inc., and Barnes & Noble Booksellers, Inc. (collectively, "Defendants") in the above-referenced matter. In accordance with Rule 1.E of Your Honor's Individual Practices, with Plaintiff's consent, and for the reasons summarized below, we respectfully write to request an extension of the parties' time to file a stipulation of dismissal until July 17, 2023.

Although, as Defendants previously noted, the parties have finalized their Settlement Agreement (the "Agreement"), and Defendants have transmitted the settlement payment pursuant to the terms of the Agreement, Defendants, as between themselves, continue to work and progress toward finalizing other details pertaining to certain non-monetary relief provided for under the Agreement. As Defendants must finalize those outstanding items prior to the filing of the stipulation of dismissal, and Plaintiff's filing of a stipulation of remediation, we respectfully request the relief sought herein, which Defendants expect will afford them sufficient time to do so.

The undersigned apologizes to the Court and all parties for the tardiness of this application, which followed the undersigned's attention to matters related to his preparation for, and appearance in, a class action trial in the Middle District of Pennsylvania that ran through the second half of June 2023.

Thank you for Your Honor's consideration of this request.

July 3, 2023

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Respectfully submitted,

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

By: s/ Evan B. Citron  
Evan B. Citron

cc: All counsel of record (via ECF)